

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

R2 Solutions LLC,

Plaintiff,

v.

Charles Schwab Corp.,

Defendant.

Civil Action No. 4:21-cv-00122-ALM

Jury Trial Demanded

JOINT NOTICE OF RESOLUTION AND MOTION TO STAY

Plaintiff R2 Solutions LLC, on the one hand, and Defendant Charles Schwab Corp., on the other hand, notify the Court that they have reached an agreement in principle that resolves the claims in this case.

In furtherance of their agreement, the parties expect to move to dismiss this case with prejudice in the next thirty (30) days. Thus, the parties respectfully ask that the Court stay all deadlines herein for thirty (30) days while they memorialize their resolution and move to dismiss.

Dated: March 1, 2022

Respectfully submitted,

s/ Edward R. Nelson III

Edward R. Nelson III

State Bar No. 00797142

Brent N. Bumgardner

State Bar No. 00795272

Christopher G. Granaghan

State Bar No. 24078585

John P. Murphy

State Bar No. 24056024

Carder W. Brooks

State Bar No. 24105536

/s/ Brett C. Govett

Brett C. Govett

State Bar No. 08235900

Lead Attorney

Norton Rose Fulbright US LLP

2200 Ross Avenue, Suite 3600

Dallas, TX 75201

Tel: 214.855.8118

Fax: 214.855.8200

brett.govett@nortonrosefulbright.com

NELSON BUMGARDNER CONROY PC

3131 West 7th Street, Suite 300

Fort Worth, Texas 76107

817.377.9111

ed@nelbum.com

brent@nelbum.com

chris@nelbum.com

murphy@nelbum.com

carder@nelbum.com

COUNSEL FOR PLAINTIFF

R2 SOLUTIONS LLC

Stephanie N. DeBrow

State Bar No. 24074119

Catherine J. Garza

State Bar No. 24073318

Talbot R. Hansum

State Bar No. 24084586

Norton Rose Fulbright US LLP

98 San Jacinto Boulevard

Suite 1100

Austin, TX 78701-4255

Tel: 512.474.5201

stephanie.debrow@nortonrosefulbright.com

cat.garza@nortonrosefulbright.com

talbot.hansum@nortonrosefulbright.com

COUNSEL FOR DEFENDANT

THE CHARLES SCHWAB

CORPORATION

CERTIFICATE OF CONFERENCE

In accordance with Local Rule CV-7(h), the undersigned certifies that counsel for Plaintiff conferred with counsel for Defendant and the parties are in agreement as to the relief sought by this joint motion.

/s/ Edward R. Nelson III

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing was served on all parties of record on March 1, 2022 via the Court's CM/ECF system.

/s/ Edward R. Nelson III